

Robert Peltz

From: Robert Peltz
Sent: Wednesday, August 10, 2011 10:53 AM
To: 'Kevin Franz'
Subject: Adelman
Attachments: DOC081011.pdf

Kevin,

I am attaching various documents that have been produced in the case with reference to Crompton and Schmidt's training. As you will note, Schmidt's record indicates that he had taken Leadership Specific Training and also that he received the Boy Scout Leadership Training Award.

Crompton's record on the other hand does not show that he either took the Leadership Specific Training Course or received the Boy Scout Training Award. There is nothing in the documentation which you sent that shows that Leadership Specific Training is a pre-requisite to Introduction to Outdoor Leadership Skills. Moreover, at the time that Crompton took the Introduction to Outdoor Leadership Skills, he was neither a Scout Master or an Assistant Scout Master, therefore there would have been no Leadership Specific Training applicable to him. Therefore, there is nothing in the documentation that has been produced in this case to support the conclusion that Crompton was a "Trained Leader."

I am not required to accept on faith the SFC's answers to interrogatories, particularly where they are inconsistent with the BSA's documentations and practices. Accordingly, unless you can answer these questions and discrepancies with acceptable documentation, which so far has not been produced, I intend to proceed forward with the corporate rep deposition. Nevertheless, in order to give you time to try and clarify these issues with your client I am willing to postpone the deposition, which is presently set for next Friday.

Bob

Robert D. Peltz
Board Certified Trial Lawyer
Leesfield & Partners, PA
2350 South Dixie Highway
Miami, FL 33133



Phone: (305) 854-4900 x 122

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Trial Lawyers with offices in Miami, Key West, South Beach and Orlando/Central Florida*

*Bounds Law Group, Of Counsel

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Person Profile: Crompton, Howard King

[Go Back Main Menu](#)

Personal Information		BSA Registrations		
Name	Howard King Crompton	Position	Organization	Expire Date
Address	10349 NW 2nd Ct Plantation, FL, 33324-1749	42	B-Pine Island	12/31/2009
Home Phone	(954) 401-3338	42	B-Pine Island	12/31/2010
Work Phone		42	B-Pine Island	12/31/2008
E-mail		Unit Registrations		
Date Of Birth	06/10/1965	Position - Unit	Expire Date	
Grade		CC, Troop 0111	12/31/2009	
Sex	M	CC, Troop 0111	12/31/2008	
Personal Affiliations		SM, Troop 0111	12/31/2010	
Organizational Affiliations				

Honors and Awards	
Award	Effective Date

Ranks	
Description	Effective Date

Training	
Course	Completion Date
New Leader Essentials	03/09/2008
Intro to Outdoor Leadership Skills	03/09/2008

Events		
Event Name	Date	Position

Person Profile: Schmidt, Andy

[Go Back Main Menu](#)

Personal Information		BSA Registrations		
Name	Andy Schmidt	Position	Organization	Expire Date
Address	911 E Country Club Cir Plantation, FL, 33317-4506	42	B-Pine Island	12/31/2010
Home Phone		42	B-Pine Island	12/31/2009
Work Phone		Unit Registrations		
E-mail	Eaglesoar111@aol.com	Position - Unit	Expire Date	
Date Of Birth	04/23/1954	CC, Troop 0111	12/31/2010	
Grade		SM, Troop 0111	12/31/2009	
Sex	M	SM, Troop 0111	12/30/2008	
Personal Affiliations		SM, Troop 0111	01/31/2006	
Organizational Affiliations		SM, Troop 0111	12/31/2006	
		SM, Troop 0111	12/31/2007	

Honors and Awards	
Award	Effective Date
S41: Boy Scout Leader's Training Aw	12/01/2008

Ranks	
Description	Effective Date

Training	
Course	Completion Date
New Leader Essentials	04/22/2004
Intro to Outdoor Leadership Skills	04/22/2004
Scoutmaster Specific Training	04/22/2004
Cub Scout Leader Basic Tng Complete	01/01/1911
Troop Committee Challenge	03/14/2009

Events		
Event Name	Date	Position

Boy Scouts of America

This is to certify that

Andy Schmidt

Has completed training in

Essential Skills

Atlanta Area

JUL 09 2004

Date

Jim & Ann Munn

Instructor

David E. Larkin

Scout Executive

Boy Scouts of America

This is to certify that

Andy Schmidt

Has completed training in

Issue Oriented Specific

Atlanta Area

JUL 09 2004

Date

Jim & Ann Munn

Instructor

David E. Larkin

Scout Executive

Boy Scouts of America

This is to certify that

Andy Schmitt

Has completed training in

Essential

Atlanta Area

JUL 09 2004

Date

Jim & Ann Munn

Instructor

David E. Larkin

Scout Executive

Boy Scouts of America

This is to certify that

ANDY SCHMIDT

Has completed training in

Youth Protection

AAC

JUL 05 2004

Date

Jim & Ann Munn

Instructor

David E. Larkin

Scout Executive

Boy Scouts of America

This is to certify that

Andy Schmidt

Has completed training in

BS First Aid

Atlanta Area

7/8/04

Date

Jim & Ann Munn

Instructor

David E. Larkin

Scout Executive

Boy Scouts of America

This is to certify that

Andrew Schariot

Has completed training in

Basic Leadership Training

New River District

October 4, 1997

Date

Mickey Huse

Instructor

Alain Nau

Scout Executive



Climb On Safely

This is to certify that

ANDY SCHMIDT

has satisfactorily completed specific instruction in Climb On Safely and has agreed to use the eight points in this plan on every occasion when

T-111

Unit and No.

goes climbing, rappelling, or bouldering.

This card is good for two years from date issued:

10-23-04

SOUTH FLORIDA COUNCIL
Boy Scouts of America Council

AC Larkin
Signature of Climbing Trainer (approved by council)

Boy Scouts of America

This is to certify that

Andy Schmidt

Has completed training in

University of Scouting

South Florida

Council

October 23, 2004

Date

JEFF HERRMANN

Instructor

Scout Executive

Boy Scouts of America

This is to certify that

Andrew Schmidt

Has completed training in

UNIVERSITY OF SCOUTING

SOUTH FLORIDA

Council

JANUARY 26, 2002

Date

LORRI RUDASILL

Instructor

JEFF HERRMANN

Scout Executive

Robert Peltz

From: Robert Peltz
Sent: Wednesday, August 10, 2011 4:10 PM
To: Kevin Franz
Subject: RE: Adelman

Kevin,

This is the first time I have seen this type of document in this case, why was it not provided earlier?

Regardless, it does not document that Crompton took the Leadership Specific Training, which is one of the required courses, nor have you provided any documentation to establish that Leadership Specific Training is a prerequisite to any of the courses which Crompton did take. As I advised you, I have no desire to take unnecessary depositions in this case and if you will provide the documentation to satisfactorily answer these questions I will agree to cancel the deposition. Nevertheless, so far you have failed to do so.

Bob

Robert D. Peltz
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CONFIDENTIALITY NOTICE

Robert Peltz

From: Kevin Franz <kfranz@lanereese.com>
Sent: Wednesday, August 10, 2011 4:16 PM
To: Robert Peltz
Subject: RE: Adelman

I'm going to contact BSA and SFC to see if such a document exists concerning prerequisites. I'll let you know as soon as possible.

Kevin Franz

Kevin D. Franz
LANE, REESE, SUMMERS, ENNIS & PERDOMO, P.A.
2600 Douglas Rd., Suite 304
Coral Gables Florida, 33134
ph. (305) 444-4418
fax. (305) 444-5504

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From: Kevin Franz <kfranz@lanereese.com>
Sent: Wednesday, August 10, 2011 1:44 PM
To: Robert Peltz
Cc: William Summers
Subject: RE: Adelman
Attachments: BS2435.pdf

<<BS2435.pdf>> Bob:

Attached please find a document that lists the training courses completed by Howard Crompton. The four courses completed prior to 2009 correspond with BSA and SFC's answers to interrogatories. I have no additional information to give you. I hope this satisfies your need to seek a 4th deposition of SFC's corporate representative. If not, please call me so we can comply with Judge Goodman's procedure of speaking prior to SFC moving for a protective order.

Thanks,

Kevin Franz

Kevin D. Franz
LANE, REESE, SUMMERS, ENNIS & PERDOMO, P.A.
2600 Douglas Rd., Suite 304
Coral Gables Florida, 33134
ph. (305) 444-4418
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